

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GARMIN INTERNATIONAL, INC. ET AL.  
Petitioner

v.

CUOZZO SPEED TECHNOLOGIES LLC  
Patent Owner

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Case IPR2012-00001  
Patent 6,778,074

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**CUOZZO SPEED TECHNOLOGIES LLC'S  
INTERROGATORIES TO GARMIN (NOS. 1-9)**

Patent Owner Cuozzo Speed Technologies LLC (“CST”) requests Petitioners Garmin International, Inc. and Garmin USA, Inc. serve written responses to these Interrogatories to CST’s lead and back-up counsel within 14 days.

Please refer to the Definitions and Instructions that follow the specific Interrogatories.

## **INTERROGATORIES**

### **INTERROGATORY No. 1.**

Please identify any patent(s), patent application(s), invention disclosure(s), or product description generated by or on behalf of Garmin prior to March 18, 2002, that describe a “vehicle speedometer with speed limit alert,” as You described in the Petition at page 13, that warns a driver if vehicle speed readings exceed the speed limit at a vehicle’s present location based upon information received at a Global Positioning Receiver.

### **INTERROGATORY No. 2.**

Explain why You decided to develop and commercialize the speed limit alert feature on Garmin Personal Navigation Devices. Please identify any market reports, market productions, or other documents reflecting efforts to assess long-felt need or market demand for the feature.

### **INTERROGATORY No. 3.**

By calendar quarter (or convenient time period for which Garmin keeps such records) state the number of Garmin Personal Navigation Devices sold and the portion of those that included a speed limit alert feature.

**INTERROGATORY No. 4.**

How much more did Garmin charge for Personal Navigation Devices with the speed limit warning/alert feature than for Personal Navigation Devices without the feature? Please explain how Garmin calculates this difference.

**INTERROGATORY No. 5.**

Identify any agreements You have entered into (other than End-User License Agreements with consumers) concerning the use, development, licensing, or ownership of intellectual property directly related to the speed limit alert in Your products.

This Interrogatory seeks information about license agreements, technology agreements, co-development agreements, or settlement agreements related to the speed limit alert technology.

**INTERROGATORY No. 6.**

If any non-Garmin entity owns or has an interest in the speed limit alert technology or intellectual property, please Identify the entity or entities and Describe their respective interest.

**INTERROGATORY No. 7.**

When did You commercially introduce the speed alert/warning feature? Please identify the first Garmin products to include the feature.

**INTERROGATORY No. 8.**

When did You begin Your efforts to develop the speed alert/warning feature?

**INTERROGATORY No. 9.**

Describe the challenges Garmin faced and any failed efforts to develop the speed limit alert feature and Explain how You overcame the challenges.

## I. INSTRUCTIONS AND DEFINITIONS

In responding and producing documents and things responsive to these Requests, please comply with the Board's Scheduling Order and instructions in the Office Patent Trial Practice Guide.

1. Please timely amend your responses if you learn that your response is incomplete or additional responsive information is found.
2. You must produce documents and things either (a) as they are kept in the usual course of business, or (b) organized and labeled to correspond with the particular categories set forth below. Please copy and produce any files or containers in which the responsive documents are kept.
3. Identify any responsive documents you are aware of but cannot produce because they have been lost or destroyed or are no longer in your possession.
4. If you object to a portion or an aspect of any request, state the grounds of your objection with specificity and respond to the remainder of the request.
5. If, in answering these requests, you encounter any ambiguities when construing a request, instruction, or definition, your response shall set forth the matter deemed ambiguous and the construction used in responding.
6. For any document withheld based upon a claim of privilege, please provide a privilege log according to the requirements of Fed. R. Civ. P. 26.

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